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IN REPLY TO REP CC NO
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EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-700

93-RF-4827

April 19, 1993

Michael S Karol Assistant Manager for Facility Operations DOE, RFO

Attn William C Rask

RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) COMPLIANCE FOR MIXED RESIDUES (02271) - JGH-056-93

This letter provides the results of the assessment and listing of RCRA Units that have to be verified to meet permit conditions, as requested in Robert M. Nelson, Jr. letter (02271) to James O. Zane, Resource Conservation and Recovery Act (RCRA) Compliance for Mixed Residues. The following items, in response to the DOE letter, were provided in a previous EG&G letter, (93-RF-3726). Plan and Schedule for identification of ancillary equipment deficiencies in Building 771 and 371, Building 371 caustic and vacuum system replacement schedules, and the strategy to support the uncleared CDH permit writer.

The assessment of EG&G's position for meeting the Mixed Residue Permitting requirements is attached. This assessment considered issues of achieving physical compliance as well as programmatic issues. Actions were identified through this assessment and will be entered into PATS in the REGCOMM origin for Residue Compliance Agreement (RCA).

Also attached is a punchlist including a complete listing of the Mixed Residue Units requested in the permit application. This listing contains data reflecting the type and location of each unit as defined in the application. A commitment date for Operations declaration of compliance and a Waste Surveillance verification of compliance appears in this punchlist. Those units already verified are shaded on the punchlist. It should be noted, that numerous units still require completion of secondary containment. The completion dates for these units are tracked through the Maintenance War Room schedules for the respective buildings. The punchlist refers to the War Room schedules for completion dates of these units. The War Room schedules are being provided to Warren Seyfert every Thursday.

ADMIN RECORD

REVIEWED FOR CLASSIFICATION/UCNI
By Bea Duran unu
Date 8-16-93

for the fire

F-46-69 (Rev 3/93)

Michael S Karol April 19, 1993 93-RF-4827 Page 2

A review of the tasks identified in the Plant Action Tracking System (PATS) as the Environmental actions, and its subset known as Environmental Deficiencies, has been made to determine if the Mixed Residue deficiencies and commitments are captured in PATS. It has been determined that most are. The commitments of the Tank Management Plan are found in origins "REGCOMM" and "WSR". They are being consolidated into "REGCOMM" and the duplicate entries eliminated. It was noted that the commitments of the Tank Management Plan only call out the specific rooms for which commitments for secondary containment preceding August 13 were made. Hence, PATS was silent on the large number of rooms coming due on August 13. Consolidated entries for the remaining rooms will be entered into PATS.

The results of surveillances performed by Waste Surveillance (within Performance Assurance) are captured in origin "EGG-WS". The entries in this origin can be coded in a manner to allow printing of a subset that includes only the surveillance results for Mixed Residue units. This is being accomplished and it is expected that status reports specific to mixed residues will be available by May 1.

A review of the tasks identified as the Environmental actions, and its subset known as Environmental Deficiencies, has been made to identify the miscellaneous tasks related to Mixed Residue. These are all under review to determine which are required by August 13 to assure that the PATS commitment dates support August 13. All future actions or deficiencies related to Mixed Residues will be added to the appropriate PATS origin.

In summary, the three tracking documents that capture all of the deficiencies and open actions related to Mixed Residue compliance are

- Maintenance War Room Schedules (for work being completed through Integrated Work Control, IWCP)
- Mixed Residue Unit Punchlist (for tracking compliance by units)
- PATS (for open actions and identified deficiencies)

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Angelo Kallas has recently been appointed as the Residue Program Manager He can be reached on extension 8759

J G Hilbig

Director, Residue Operations EG&G Rocky Flats, Inc

slt

Orig and 1 cc - M S Karol

Enclosures As Stated (2)

Enclosure 1 93-RF-4827 April 8, 1993 Page 1 of 10

1 INTRODUCTION

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The judgement in Sierra Club v United States Department of Energy (DOE) requires DOE to obtain a permit for mixed residues by August 13, 1993, or stop all operations at Rocky Flats that generate any hazardous waste or mixed radioactive and hazardous waste. Actions to achieve RCRA Compliance and permit conditions have been on going for over a year. An assessment of the remaining issues requiring resolution, and the actions requiring completion has been made. This report provides a description of the issues and associated actions. Commitments to resolve these issues and actions will be entered into PATS under the "Regcomm" origin, only if they are not already in PATS under some other origin.

2 ISSUES

2 1 Ancillary Equipment Inspections in Buildings 371 and 771

Buildings 371 and 771 RCRA tank ancillary equipment is insufficiently identified to permit adequate routine inspection and assessment of equipment condition. A facility project has been developed with the collaboration of Operations and Engineering to evaluate all Building 371 and 771 ancillary equipment for residue tanks intended to be permitted. Any deficiencies found in the course of the evaluation will receive priority attention for correction by July 16. The project will also yield controlled drawings to facilitate routine inspections. Ancillary equipment for tanks not intended to be permitted will be evaluated upon completion of the to-be-permitted ancillary equipment project. The major deficiencies anticipated for to-be-permitted ancillary equipment involve lack of secondary containment. The plan requires identification of deficiencies by April 30 and correction of deficiencies by July 16. This plan has substantial schedule risk because the extent of facility work needed is not yet known.

2 2 Physical Compliance of Permitted Residue Storage Areas

Achieving permit conditions in the numerous container, tank, and glovebox storage areas identified in the Permit Modification has been a formidable task. A process to verify compliance, unit by unit, has been established. This process requires Operations Management to state in writing that they believe a unit is in physical compliance with the permit modification. The Waste Surveillance organization from Performance. Assurance then performs the annual surveillance, per their established procedures, to verify the unit is in compliance. Any deficiencies existing at that time are entered into PATS per established procedures, and operations must respond within 5 days to initiate correction for the deficiency. If there are no deficiencies documented in the surveillance report, then that report stands as the documentation that the unit is in compliance. If deficiencies are found, PATS becomes the record of deficiencies and commitments and will be tracked to assure correction prior to August 13, 1993.

Document Classification Review Waiver per RFP Classification Office

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A complete listing of the Mixed Residue Units identified in the permit modification is attached, with commitment dates for the Operations certification of compliance Commitments for the Waste Surveillance verification are also identified. The status of each unit as of April 15, 1993 is also identified. This list will serve as a punchlist for the review and tracking of progress in achieving and verifying compliance. It will be updated and statused weekly at the Deputy General Manager's Program Progress review meeting. It should be noted that the commitment dates support Operations verification of compliance prior to June 1, except where secondary containment remains an open deficiency. If an open work order exists to complete secondary containment, the war room schedules are referenced for the scheduled completion date.

Considerable work remains for the completion of secondary containment in Buildings 776, 777, 371 and 771. The work is scheduled on a priority basis to ensure its completion and verification by August 13, 1993. Two issues create a moderate risk of not meeting the Aug 13 date for secondary containment.

- a) A large number of additional berm requirements were identified this winter These work packages have gone the Davis-Bacon route, and are currently in various stages of the approval process. They are all also in various stages of Engineering.
- b) There are no rooms in Building 371 requiring secondary containment that are currently on supplied air. But, the possibility exists, that after entry into some of these rooms, airborne contamination levels may reach the point requiring supplied air. Difficulties with Building 371 equipment has prevented use of supplied air to this point. Self Contained Briefing Air. (SCBA) has been used successfully to date, to enter rooms. SCBA is manpower intensive, and limited in its use. SCBA will continue to be used in place of SBAGs until the Building 371 equipment issues are resolved.

Schedules for completing the secondary containment in these buildings are being tracked daily in the Maintenance War Rooms No further actions are required at this time for this issue

2 3 Maintaining Secondary Containment

Maintaining and inspecting secondary containment is going to be complicated by the following

- The presence of drums, crates, mats and process equipment in storage areas will preclude 100% inspection of secondary containment
- There are high traffic areas and areas of frequent drum movement, which will increase the chance of damage to secondary containment

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Operations will define and formalize the process for inspection and maintenance of secondary containment, in a safe, effective and cost efficient manner. This effort will be led by the Residue Management Office, with a completion date of June 4, 1993.

2 4 Inventory Completeness and Accuracy

Efforts to produce a verified inventory of mixed residues has been hampered by the existence of multiple databases containing residue information. The Waste and Environmental Management System (WEMS) has been expanded to include most of the mixed residues. The remaining mixed residues are in the Safeguards Accountability. Network (SAN). At this time, the following categories of residues are known to be missing from WEMS.

- IDCs previously identified as product, but recently declared to be residues
- Classified Residue IDCs
- Solutions in bottles, stored in gloveboxes
- Solutions in tanks
- Mixed Residues stored in 8801 cans
- All mixed residues stored in the Stacker Retriever

Waste Operations is currently entering all of the mixed residues in the 8801 cans into WEMS. The remaining items will remain in SAN until WEMS can be upgraded to incorporate this information. A position paper documenting what the official inventory record is for each mixed residue unit is being prepared. This document will detail the responsibilities for maintenance and reporting of the inventory and will be finalized by July 1, 1993.

Waste Operations physically verified the residues recorded in the WEMS database in the fall of 1992, but failed to retain documentation of the verification. Waste Operations will physically re-verify the WEMS and SAN mixed residue inventories after all of the 8801 cans are entered. A final, verified, complete mixed residue inventory will be provided by July 1, 1993.

Finally, a plan for the upgrade of WEMS to incorporate capabilities to track liquids, and to provide a more responsive reporting capability, is under development. A plan for the upgrade of WEMS will be provided by July 1, 1993.

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2 5 <u>Program Guidance Required</u>

Several areas of concern exist that require guidance from the Waste Programs
Organization These areas were detailed to Waste Programs in a letter dated February
12, 1993, J G Hilbig to A L Schubert, "REQUEST FOR POLICY AND GUIDANCE"
JGH-026-93 The guidance requested in the following areas will be provided through revisions to the Hazardous Waste Requirements Manual

a) Program Guidance for Residue Inventories

Programmatic guidance for the performance of routine inventories and bimonthly surveys of residue storage areas is not adequate to ensure consistent and verified inventory information. Waste Programs has been advised of this problem and has committed to providing formal procedural guidance and indoctrinations for residue inventories and bimonthly surveys.

b) Standard RCRA Unit Inspection Procedure

The current procedure for RCRA inspections is inadequately detailed to support internal identification of the full range of possible non-conforming conditions. This problem has been communicated to Waste Programs, a more detailed inspection process will be defined and documented.

- Current internal requirements do not address methods, frequencies, responsibilities, and records for the routine testing of remote monitoring equipment in residue storage areas. Waste Programs will provide formal procedure guidance and indoctrinations for routine testing of remote monitoring devices.
- d) Guidance for Inspection of Out-of-Service Tanks

 Biweekly visual inspection of out-of-service tanks, required by the Mixed Residue Tank Systems Management Plan, is not subject to formal procedure guidance. Waste Programs will provide formal procedure guidance and indoctrinations for routine testing of out-of-service tanks.

The required revisions will be available in draft form for review by April 30 They will be approved by June 4 and published in the Hazardous Waste Requirements Manual by August 4

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2 6 Drum Relabelling

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Drum relabeling necessitated by the Backlog Mixed Residues Hazardous Waste Determination Report has been completed in all areas except rooms 3511 in Building 371, which contains 10 gallon drums requiring relabeling. Due to ALARA concerns with handling these drums, the relabelling of these drums will take place in conjunction with the move of these drums from 3511 to 3606. This move is taking place to facilitate secondary containment painting of 3511. Due to this link, the labeling will take place per the 3511 paint schedule, which currently calls for painting of 3511 in late April it is expected that the relabeling will be completed by May 12, 1993.

2 7 Residue Characterization Delay

The inventory of backlog residues has been characterized by process knowledge However, start of sampling and analysis activity described in the Backlog Residue Analytical Plan has slipped significantly. The only commitment made to the state in this area is to have 800 Residue samples characterized by the end of FY96. The level of detail in these commitments is minimal, making assessment of progress difficult.

The budget work package for this sampling program committed to perform 200 samples in FY93 Laboratory capability to perform analysis on 200 contaminated samples is in place. To date, 22 waste streams have been sampled and analyzed, in support of the solution disposal efforts in Building 771. The labs are experiencing significant delays in being allowed to sample waste streams because of various building operational issues. A sampling and analysis plan has been written and initially reviewed for the pyrochemical salts. A Task Information Package (TIP) is being prepared to support the safe opening and sampling of these containers. Additional TCLP extraction development will be required after samples are obtained.

It is not in the scope of this current assessment to evaluate the long term prognosis for meeting the Residue Characterization commitments. The Laboratories did suffer difficulties early in the Fiscal Year in establishing their capability. Significant progress has been made in establishing capabilities, with more work required in future Fiscal Years. Since this issue effects longer term compliance and does not impact the immediate compliance requirements for August 13, no further laboratory actions will be identified at this time. But, the long term commitments from the Backlog Residue Analytical Plan will be entered into PATS by May 1, 1993, to assure these commitments are tracked over the next few years.

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2 8 RCRA Residue Storage Unit Signs

Numerous mixed residue storage units have been labelled "permitted unit" in anticipation of being permitted. The Colorado Department of Health identified the signs as deficiencies during several on-site inspections. The word "permitted" will have to be covered on these signs until the permit is approved. The Hazardous Waste Requirements Manual is being revised to allow this change to the signs. The revision will be issued by Waste Programs by April 20, 1993. Signs will be adjusted or replaced by Operations by May 14, 1993.

2 9 Permit Section Part VII - Personnel Training

It has been determined that the EG&G is not in compliance with the current Permit, Part VII on training (ENV-DEF-005) This part is not modified by the Permit Modification for Mixed Residues, hence compliance with the existing section is required for Mixed Residues. A permit modification request to change the Training Section was submitted to CDH in January 1992. CDH provided comments and a revision was resubmitted in November 1992. Upon approval of this modification by CDH, the issue will be resolved An Action Plan for this deficiency has been submitted in response to the Environmental Deficiency (#92-007262) and is in PATS

2 10 Permit Section Part VI - Contingency Plan

The RCRA Contingency Plan needs to be updated to incorporate revisions to the process of release response, including decontamination. This is a programmatic deficiency. This part is not modified by the Permit Modification for Mixed Residues, hence compliance with the existing section is required for Mixed Residues. EG&G expects to submit a revised Contingency Plan to CDH in early May with a request for temporary authorization. An Action Plan for this deficiency has been submitted (#93-000420, Plan #559-00004) and has been submitted to PATS.

2 11 Aisle Space

Room 134 in Building 776 is an interim status storage unit with 18" aisle space Because it is included in the Residue Permit Modification, a change to 26" is required Due to the congestion in this unit, and the need to provide operational working space for the Supercompactor and the Size Reduction Facility, drums will need to be removed from the area in order to achieve compliance. This issue has been captured in Environmental Deficiency #165, and an action plan submitted. This action plan has the unit achieving adequate aisle space by August 13, 1993. Efforts to accelerate this action plan have been initiated.

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2 12 Building 371 Tank Contents

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Questions have been raised about the actual status of tanks identified as "Operationally Empty" (Category C) in the Revised Mixed Residue Tank Systems Management Plan There were four tanks believed by Operations Management in Building 371 to be empty based on process knowledge, yet SAN reported these tanks as containing inventory. As a result, actions to verify tank status for these four tanks were initiated. Three tanks were evaluated using a new liquid Crystal indicator strip provided by R&D. Indications were that two of the tanks were empty and one was more than half full. This has raised issues with the status of the remaining tanks defined as Category C. Prior to the resubmission of the Tank Management Plan to DOE on June 1, the Category C tanks will be reverified as operationally empty.

2 13 Compliance with other Permit Sections

Programmatic assessments of compliance with the following sections of the Permit Modification as applied to Residues will be completed by Performance Assuranceby July 1, 1993

Part IV - Waste Analysis Plan (modified by Mixed Residue Permit Application)

Part V - Procedures To Prevent Hazards (modified by Mixed Residue Permit Application)

Part XI - Waste Minimization (not modified by Mixed Residue Permit Application)

Part XII - Land Disposal Restrictions (not modified by Mixed Residue Permit Application)

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ACTION SUMMARY FOR RESIDUE COMPLIANCE ISSUES - TO BE ENTERED INTO PATS

ACTION	RESPONSIBLE MANAGER	COMPLETION DATE
1. Buildings 371/771 Ancillary Equipment		
Complete Ancillary Equipment assessments and provide a list of deficiencies to Operations	C. Caimi, Systems Field Engineering	Aprıl 30, 1993
1 2 Submit preliminary drawings of ancillary equipment for 771/371 to Operations	C Caimi, Systems Field Engineering	July 2, 1993
Work orders for ancillary equipment deficiencies and labeling generated and deficiencies entered into PATS for Building 771	D Bailey, 771 Operations	May 7, 1993
Work orders for ancillary equipment deficiencies and labeling generated and deficiencies entered into PATS for Building 371	N Van Tyne, 371 Operations	May 7, 1993
Complete Ancillary equipment repairs or institute compensatory actions - Building 771	D Bailey, 771 Operations	July 16, 1993
Complete Ancillary equipment repairs or institute compensatory actions - Building 371	N Van Tyne, 371 Operations	July 16, 1993
2. Maintenance of Secondary Containment		
Publish Position paper on process to maintain secondary containment	A Kallas, Residue Management	June 4, 1993
3 Operating Record Completeness and Accuracy		
3 1 Complete data entries into WEMS for all residues stored in 8801 cans	G L Aguero, Waste Assay and Shipping	July 1, 1993
3 2 Complete a verification of the data in WEMS	G L Aguero, Waste Assay and Shipping	July 1, 1993
3 3 Publish a Position Paper defining what the official inventory record is for each Mixed Residue Unit, capturing all residues	G L Aguero, Waste Assay and Shipping	July 1, 1993

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3 4 Publish an improvement plan for	G L Aguero, Waste Assay	July 1, 1993
the upgrade of WEMS	and Shipping	
3 5 Publish a consolidated, verified,	W H James, Nuclear	July 1, 1993
inventory of Mixed Residues	Materials Management	
4 Program guidance required		j
4 1 Submit draft revisions to the	P Edrich, RCRA	April 30, 1993
Hazardous Waste Requirements	Regulated Programs	April 30, 1993
Manual to address residue	l legulated i logiams	1
inventories, revised inspection		
procedures, testing of remote	1	
monitoring, and out-of-service	1	
tanks		
4 2 Final approval of HWRM revisions	P Edrich, RCRA	June 4, 1993
	Regulated Programs	
4 3 Publish revisions to the manual	P Edrich, RCRA	August 6, 1993
	Regulated Programs	
5. Drum Relabelling		
5 1 Complete relabelling of drums in	G L Aguero, Waste Assay	May 12, 1993
room 3511 in Building 371	and Shipping	
6 RCRA Residue Storage Unit Signs	P Edrich, RCRA	April 20, 1993
	Regulated Programs	
6 1 Issue Guidance on alteration of		
Permitted areas signs		
6 2 Modify Permitted area signs in	B D. Larsen, Operations	May 14, 1993
Building 771		
6 3 Modify Permitted area signs in	D R Jackson, Operations	May 14, 1993
Building 371		
6 4 Modify Permitted area signs in	J A Geis, Operations	May 14, 1993
Building 559/779		
6 5 Modify Permitted area signs in	J M Bower, Operations	May 14, 1993
Building 776/777		
6 6 Modify Permitted area signs in	A J Holifield,	May 14, 1993
Building 707	Operations Operations	Mai: 00, 1000
7. Tank Status Verification	J M Bower, Operations	May 28, 1993
7 1 Verify Status of Operationally		
empty tanks in 777		
7 2 Verify Status of Operationally	D R Jackson, Operations	May 28, 1993
empty tanks in 371	2 vadison, operations	ay 20, 1000
7 3 Verify Status of Operationally	B D Larsen, Operations	May 28, 1993
empty tanks in 771		
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8. Backlog Residue Analytical Plan 8.1 Enter the long term commitments from the Backlog Residue Analytical Plan into PATS	V Church, Waste Iden & Char	May 1, 1993
9. Programmatic Assessments		
9 1 Complete assessment of Part IV - Waste Analysis Plan	R A Sadesky, Envir & Waste Assessment/Audits	July 1, 1993
9 2 Complete assessment of Part V - Procedures top Prevent Hazards	R A Sadesky, Envir & Waste Assessment/Audits	July 1, 1993
9 3 Complete assessment of Part XI - Waste Minimization	R A Sadesky, Envir & Waste Assessment/Audits	July 1, 1993
9 4 Complete assessment of Part XII - Land Disposal Restrictions	R A Sadesky, Envir & Waste Assessment/Audits	July 1, 1993

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Uliding Room RCRA Unit Type Type Control Solid Verification Commitment Dates 1/Pe Digraphon Solid Commitment Dates 1/Pe Digraphon Solid Commitment Dates	TM049069 Requires	Per War Room	Per War Room	y	, v	30 30 30 30 30 30 30 30 30 30 30 30 30 3		<u> </u>	6	3420	3/1	
Room RCRA Unii Type Liquid Solid Verification Wasie Surveillance	0.00		Commitment Dates		Sloran		100,000	type				
Silur Anisau paxiim		Waste Surveillance	Operations Verification			Туре	~;──	-;- -	RCRA U	Room	Bullding	
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L				371					3/1						371					-	371					371					371		371	371	3/1	27.	371	371		371	371		371			Bullding		
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			1	Tank 0 24028					Tank D 2402A					1011 C 64010	Tank D SAGED					Tank D 2401C						Tank D 2401B					Tank D-2401A													T#NA	(Pe		Mixed Residue	
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			12/30/93					-	12/30/93					12/30/93						12/30/93					12/30/93	40/20/00				12/30/93	10/00/00	6/28/93	**************************************		5/5/95	6/28/93	4/19/93	Schedules			3	Per War Hoom		Commitment Dates	Verification	Operations	İst	
																																7/1/93	517193		2017104	7/1/93	4/22/93	Schedules	Per War Room	~ % ###################################	Schedules	Per War Room		Commitment Dates		Wasie Surveillance		
IM051057	given 2)Needs borne	system not in place	1)New caustic treatment	TM051057	given 2)Needs berms	therefore dates cannot be	system not in place	Divew causiic realment	1 Mos 105/	THOE LOET	given 2)Needs borns	therefore dates cannot be	system not in place	1)New caustic treatment	TM051057	given 2)Needs berms,	therefore dates cannot be	system not in place	I I I I I I I I I I I I I I I I I I I	Thou carrie	TM051057	given 2)Needs berms	therefore dates cannot be	system not in place	1)New caustic treatment	TM051057	given 2)Needs berms	therefore dates cannot be	system not in place	1)New caustic treatment	3202	TMO51166, Pending Room	Complete Carlo Services		The state of the s	Pending Boom 1202	TMO49069, Pending painting	& paint	TM049069, Pending decon	Complete	ALARA issue	TM049069, Requires paint,			Status		(

#48											
3)Needs revised action plan	- (3										
2)Letter sent to K Ticknor											
1)Pending closure plan	7/19/93	7/6/93		٧	Y						
Review contents & logs		5///93							90 147	Mod C pit	707
Review contents & logs		5///93		i V					90 146	Mod C pit	707
Review contents & logs		58/1/6					55	7	90 107	L pow	707
neview contents & logs		E/7/03	•	<	<		A30,125	6	90 106	Mod A	707
Pending waste surveillance	5/18/03		v	3	~			<u>თ</u>	90 105	103B	707
by letter 4/14/93	50000			<	<		_	6 3	90 56	103A	559
Waste surveillance notified	5/28/93	a) Highlon	****	~	,						
Pending waste surveillance	5/28/93	Complete			۲		E4,5,11,12,13.		90 29	101	559
by letter 4/14/93				•	۲		-	3	90 26	103E	559
Waste surveillance notified	5/28/93	Complete	***	~	~				;	,	
by letter 4/14/93							M12 13 14 20	2	90 102	103	559
Waste surveillance notified	5/28/93	Complete	***	٧	¥		24 28 428 52		90,101	Č	,
(SWP)	5/28/93	5/21/93						1		100	559
(SWP)		Schedules				Tank D 49D		3 2	91 043	3563	371
Pending decon & paint	3	Per War Room				190					
	L	Schedules				Tank D Ago		2	91 042	3563	371
Pending decon & paint	3	Per War Room				Talls 0 490		_		,	_
		Schedules				Tool D ion		3	91 041	3563	371
Pending decon & paint	3	Per War Room				I ank U 55B					
		Schedules				7		3	91 040	3559	371
Pending decon & paint	Per War Room	Per War Room				lank D 55A				6	
surveillance								T	0 00	3559	371
TMO27667 Enilod Initial	4/30/93	4/19/93				Tank D 292B			1016	2317	-
IMO27667, Failed initial	4/30/93	11 0100							2	2244	771
(TM047343)	Schedules	Seinoeline				Tank D 292A	2		91 016	2317	371
Pending decon & paint	Per War Room	Cohodala									
(TM047343)	Schedules	Schedules				Tank D 934B	2		91 015	2223	371
Pending decon & paint	Per War Room	Per War Room				0 0000					
& paint		Schedules				Tank D 0344	2		91 014	2223	371
TMO27667, Pending decon	Per War Room	Per War Room				1ank D-293B				:	
& paint	Schedules	Schedules					3	T	91 013	1127	371
TMO27667 Pending decon	Per War Room	Per War Room				Tank D 293A			81012		
given 2)Needs berms,								T		1197	371
therefore dates cannot be											
system not in place				_							
1)New caustic treatment		12/30/93				1					
					etisois 8	Tank D 2403	2		91 007	1103	371
Cinico	Commitment Dates	Commitment Dates		0000	Contains			type			
	Waste Surveillance	Operations Verification	Solid	Llquid		Туре	Туре		RCRA Unit	Room	Building
{		18	Punchilst	CITICS				4			
		*	11.16	11515	Reciding	Mixed E					
											-

Review contents & logs	5/26/93	5/7/93	у	n	γ			3	90 74	141, J vault	707
1)TP064352 caulk & seal walls & sump covers 2)Requires spot painting TP061112 (need date) 3)Permit mod to delete berms (letter sent to Edrich) 4)Review contents & logs	Per War Room Schedules	Per War Room Schedules		Y	Υ			ى	90	r&G Hail	707
1)TP064352 caulk & seal walls & sump covers 2)Requires spot painting TP061112 (need date) 3)Permit mod to delete berms (letter sent to Edrich) 4)Review contents & logs	Per War Room Schedules	Per War Room Schedules		Y	*			ω ω	90 60	G&H Hail	707
contents & logs 1)TP064352 caulk & seal walls & sump covers 2)Requires spot painting TP061112 (need date)	Per War Room Schedules	Per War Room Schedules		У	¥			ယ	90 59	Mod A, C Cell	707
1)TP064352 caulk & seal walls & sump covers 2)Requires spot painting TTP061112 3)TP038653 need berm 4) review	Per War Room Schedules	Per War Room Schedules		Y	У			ω	90 58	196	707
1)TP064352-caulk & seal 1)TP064352-caulk & seal walls & sump covers 2)Requires spot painting TP061112 (need date) 3)Review contents & logs 4) permit mod to delete berms (letter sent to	Per War Room Schedules	Per War Room Schedules		У	Ą			ω	90 28	E&F Hall	707
1)TP064352 caulk & seal walls & sump covers 2)Requires spot painting TP061112 (need date) 3)Review contents & logs 4) permit mod to delete berms (letter sent to	Per War Room Schedules	Per War Room Schedules		У	y	2007	ł		90 27	C&D Hall	707
Status	Waste Surveillance Commitment Dates	Operations Verification Commitment Dates	Solid	Liquid	Container	Type Tank	Gloyebox	unit	RCRA Unit	Room	Building
		1 1	Punchlist	Units	Residue	Mixed R					(

					Miyed Besidue	2214112	15145	1			(
Building	Room	RCRA Unit			Туре		Liould	Solid	- 1	Waste Surveillance	
			unit type	unit Container type Ctovebox Tank Signade	Tank	Container			Commitment Dates	Commitment Dates	\$10.00
707	136, H vault	90 75	ယ			٧,	a		7/6/93	7/15/93	Needs deleted, letter send
707	Mod H cage	90 76	اد					Y			to K Ticknor
707	G Corridor Cage	90 77	د			Y	-	У	5/7/93	5/26/93	Review contents & logs
,	9	9	(~	~		Per War Room Schedules	Per War Room Schedules	1)TP064352 caulk & seal walls & sump covers
											2)Requires spot painting
											TP061112 (need date)
											3)Permit mod to delete
											4)Review contents & logs
707	Mod C pit	92 001	2		Tank V-100				NA	NA	1)Panding closure plan
											2)Letter sent to K Ticknor
											3)Needs revised action plan
/0/	Mod C pit	92 002	N		Tank V 30				NA.	NA	1)Pending closure plan
											2)Letter sent to K Ticknor
											3)Needs revised action plan
Ì	Mod C pit	5003	N		Tank V 31				NA	NA	1)Pending closure plan
											2)Letter sent to K Ticknor
707											3)Needs revised action plan #48
Š	Mod C pit	92 004	N		Tank V-1				NA	NA	1)Pending closure plan
											2)Letter sent to K Ticknor
707	Mod Car	200									#48
	o pr	92.000	r		Idik V-IZ				Ž	×	1)Pending closure plan 2)Letter sent to K Ticknor
											eds revised ac
707	Mod C pit	92 006	2		Tank V 13				NA	NA	1)Pending closure plan
											2)Letter sent to K Ticknor
											3)Needs revised action plan
707	Mod C pit	92 007	N		Tank V-14				AN	NA	1)Pending closure plan
											2)Letter sent to K Ticknor
											# 48
/0/	Mod C pit	82 008	N		Tank V-15				X	NA	1)Pending closure plan
			_								2)Letter sent to K Ticknor
											# 4.8
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#48											
<u></u>											
2)Letter sent to K Ticknor	-										
1)Pending closure plan	NA	NA				I dilk y o		_	-	1100 O pil	
#48						Tank V B	0		92 019	Mod C pit	707
3)Needs revised action plan	-										
2) eller sent to K. Ticknot											
1)Dending close	NA	NA				Tank V 7	2		92 018	Mod C pit	707
3)Needs revised action plan								_			
2) Letter sent to K Ticknor									-		
	×	\$								•	
#48						Tank V 6	2		92 017	Mod C pit	707
3)Needs revised action plan											
2)Letter sent to K Trcknor											
1)Pending closure plan	NA A	NA A				I dila					
#48							9		92 016	Mod C pit	707
3)Needs revised action plan											
2)Letter sent to K Ticknor											
1)Pending closure plan	NA	NA				Idily A-4				7	
#48						Tank V A	9		92 015	Mod C pit	707
3)Needs revised action plan							_				
2)Letter sent to K Ticknor											
1)Pending closure plan	NA	Ä				9 4 6					
#48						Tank V 3	2		92 014	Mod C pit	707
3)Needs revised action plan											
2)Letter sent to K Ticknor											
1)Pending closure plan	NA	Ä				A V				•	_
#48						Tank V a	0		92 013	Mod C pit	707
			_								
2)Letter sent to K Ticknor											
1)Pending closure plan	NA	NA				I STILL A LIES					
#48						Tank V-10	2	012	92 0	Mod C pit	707
			_					_			
2)Letter sent to K Ticknor											
1)Pending closure plan	NA	NA				I alik V I o					
#48						Tank W 40	0	2	92 0	Mod C pit	707
3)Needs revised action plan											
2)) eller sent la K Ticknor			_								
1)Pending closure plan	NA.	¥				lank V-17		5	37.0	mod o pic	
#48								\$	3	Mod C not	707
3)Needs revised action plan		_						_			
1)Pending closure plan	NA	¥				Tank V-16	N	600	92 0	Mod C pit	, 6,
	Commitment Dates	Commitment Dates		XX.XX	Sigrage	Tank	lype Gloyebox	_			707
Status		Verilication	office	FIGURE			Innu	_			
	Waste Surveillance	Operations	2			Type		<u> </u>	RCRA Unit	Room	Building
(, it	Punchlist	Units F	nesique	MIXEG					
					7						-
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	do.				7					2 PM	4/19/932 12
Remove from permit	NA	NA		y	У			မ	90 31	179	/71
(TA001372)/Seal in	Schedules	schedules									
Berm complete	3	Sobalilar	۷	=	•						
berm package(TA001372)	L	Schedules						ယ	90 30	146A	771
Job is planned, waiting for	Per War Room	Per War Room		٧	~			۵	90 25	301,303,304	-
progress								,	20	Annu	771
Waste surveillance in		4/20/93	y	3	у			ω	90 24	182	771
TA001560, Seal floors, Job	8/2/93	//30/93		,	y						
	8	Schedules						ω	90 23	181A	771
TA001560, Seal in progress	3	Per War Room		~	٧		30	1,3	90 22	4	
A001560, Seal in progress	Schedules	Schedules									771
progress	L	Dor War Dam		۷	<		24.30	1,3	90 21	149	771
Internal inspection in	5/11/93	4/20/93		٧	٧		4,9 bx1,bx6	_	90 140	- 59	
progress									3	150	771
progress	5/11/93	4/20/93		¥	٧		prep box	_	90 139	158	771
Internal inspection in	5/5/93	4/20/93		у	У		49	_	90 138	154	
Waste surveillance in		4/20/93	٧	5	У			<u>د</u>	90 129	703	
Š		4/20/93		¥	Y		10/A, 18/C, 18/D		221.06		77.
١.	1/18/83	% 1/18/93		Y	У			1,3	90 121	180 K	771
	() () () () () () () () () ()	% % 1/18/93% % %		v	Y		F 60	1,3	90 120	180 F	///
Complete	(te/93	2118/03		<	V		E10,11	1,3	90 119	180 E	771
, , ,	20180 V				۷,		D 2	1,3	90 118	180 D	771
A . Kenet Willer Tolker Tolker	pin . 594 4 1 1 1 1 1 1 1 1	STATE OF STATE		<	Y		A31,51,52,53		90 117	180A	771
progress	2/13/93	111000			,		74,79A,79,81A, 81, 98,101,103				
		4/20/03		۷	<		60,62,67,68 72,	_	90 116	164	771
Internal inspection in progress	5/13/93	4/20/93		4	•		, , , ,				
progress (TM001560)	L	Schedules			:		105, 107, 108	_	90 115	163	771
1)Berm complete 2)Seal in	Per War Room	Per War Room		y	y			ယ	90 114	146	771
TA001560, Seal in progress	3	Per War Room		ם	٧	Tank D 934		N	90 113	14,0	
Internal inspection in	5/11/93	4/20/93	~	=	y			Π			771
progress					=		calorimeter	ω	90 112	169	771
Internal inspection in	5/11/93	4/20/93	٧	9	У		calorimeter	ω	90 111	160	
Internal inspection in	5/5/93	4/20/93		9	٧						
	Commitment Dates	Commitment Dates			Storage	Tank	lype Glavebox		90	152	771
SuleiS	Waste Surveillance	Operations Verification	Solid	Liquid		Type			RCRA Unit	Room	Building
(1	Punchlist	Units P	Resic	Mixed					
					,						*

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Bullding	Room	RCRA Unit			Туре		Liquid	Solid	Operations Verification	Wasie Surveillance	Siatus
771	100		type	Glovabox	Container Tenk Storage	Container			Commitment Dates	Commitment Dates	
	ā	90 32	ယ			y	כ	٧	1/8/93	EB/8/1	Floor this been seeled, now string residue drums from
771	182A	90 36	ယ			у	э	٧	4/20/93		Waste surveillance in
771	172	90 64	ပ	A 31, 51, 52 53		y	3	٧	Per War Room	Per War Room	Progress TA002372, Need berm for
771	184	90 65	ပ			y	כ	V	Schedules 4/20/93		storage liquid
771	188	90 82	ယ			<	;	:			progress
771	146C	90 83	ယ			× ×	בכ	< <	4/20/93		Review in progress
							:	•	4/23/93	4/30/93	This is a vault/waste surveillance review in
771	180B	90 84	ယ			y	ם	Y	1/18/93	7774093	1/18/93 Built & beam to separate
771	147	90 97	ယ			¥	ם		4/23/93	5/5/93	from Roam \$80A* & **/ Internal inspection in
3	114	93 001	8		Tank D-500				Per War Room	3	TA001560, Seal in progress
	114	93 002	2		Tank D 501				Per War Room	ğ	TA001560, Seal in progress
	114	93 003	0		Tank D 502				Per War Room Schedules	Per War Room	TA001560, Seal in progress
77.	4	93 014	N		Tank D 544				Per War Room Schedules	3	TA001560, Seal in progress
	-	93 015	N		Tank D 545				Per War Room Schedules	3	TA001560, Seal in progress
	114	93 016	N		Tank D 546				Per War Room Schedules	3	TA001560, Seal in progress
	114	93 017	N		Tank D 547				Per War Room Schedules	3	TA001560, Seal in progress
	114	93 018	2		Tank D 548				Per War Room	3	TA001560, Seal in progress
771	114	93 019	N		Tank D 549				Per War Room	3	TA001560, Seal in progress
771	114	93 020	N	1	Tank D 550				Per War Room	Per War Room	TA001560 Seal in progress
771	114	93 021	N	T	Tank D-551				Per War Room	Schedules Per War Room	TA001560, Seal in progress
771	114	93 022	N		Tank D 552				Schedules Per War Room		
771	114	93 023	N	-	Tank D 553				Per War Room	3	TA001560, Seal in progress
771	114	93 024	N	7	Tank D-554				Per War Room	Per War Room	TA001560. Seal in progress
A/10/032 12									Schedules	Schedules	

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	Schedules	Schedules	_				-		
TA001560, Seal in progress	3	Per War Room			Tank D-452		93 096 2	149	771
		Schedules							
TA001560, Seal in progress	3	Per War Room			Tank D-451		93 095 2	149	771
•		Schedules				*			
TA001560, Seal in progress	3	Per War Room			Tank D-364	-	93 094 2	149	771
	Schedules	Schedules							
TA001560, Seal in progress	3	Per War Room		_	Tank D-361		93 091 2	149	771
		Schedules							
TA001560, Seal in progress	3	Per War Room			Tank D-360		93 090 2	149	771
progress (TA001560)		Schedules							
1)Berm complete 2)Seal in	3	Per War Room			Tank D-1022		93 048 2	146	771
progress (TA001560)		Schedules							
1)Berm complete 2)Seal in	3	Per War Room			Tank D-1013		93 047 2	146	771
progress (TA001560)	Schedules	Schedules							
1)Berm complete 2)Seal in	3	Per War Room			Tank D-1012		93 046 2	146	771
progress (TA001560)	Schedules	Schedules							
1)Berm complete 2)Seal in	3	Per War Room			Tank D-1011		93 045 2	146	771
progress (TA001560)		Schedules							
1)Berm complete 2)Seal in	Э	Per War Room			Tank D 1010		93 044 2	146	771
progress (TA001560)		Schedules							
1)Berm complete 2)Seal in	3	Per War Room			Tank D-1009		93 043 2	146	
progress (TA001560)		Schedules					T		
1)Berm complete 2)Seal in	3	Per War Room		_	Tank D-1008		93 042 2	146	
progress (TA001560)		Schedules					T		4
1)Berm complete 2)Seal in	3	Per War Room			Tank D-1002		93 036 2	146	
progress (TA001560)		Schedules							
1)Berm complete 2)Seal in	3	Per War Room			Tank D 1001		93 035 2	146	
		Schedules					\top		171
TA001560, Seal in progress	3	Per War Room			Tank D 955		93 034 2	-	, , ,
	Schedules	Schedules					T		771
TA001560, Seal in progress	3	Per War Room			Tank D 954		93 033 2	3	
	Schedules	Schedules					T		177
TA001560, Seal in progress	3	Per War Room			Tank D 953		93 032 2	114	
		Schedules					T		
TA001560, Seal in progress	3	Per War Room			Tank D 952		93 031 2	114	771
		Schedules							
TA001560, Seal in progress	3	Per War Room			Tank 0 951		93 030 2	114	111
		Schedules					T		7,1
TA001560, Seal in progress	3	Per War Room			Tank D 949		93 029 2	14	
		Schedules					T		77.
TA001560, Seal in progress	3	Per War Room			Tank D 706		93 026 2	-	
	Schedules	Schedules					T		771
TA001560, Seal in progress	Per War Room	Per War Room			Tank D 705		2 220 56	-	
				Storage	Tank	Gloyebox:	lyp		771
Status	Commitment Dates	Commitment Dates		Container			unit		
	Waste Surveillance	Operations	Solid	Liquid	Typ•		RCRA Unit	Room	Building
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1)Pending deletion 2)Letter sent to K Ticknor			У		У			. u	90 124	148	99
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